

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

CURTIS M. COLLINS,)
)
Plaintiff,)
) C.A. No. 05-739 SLR
v.)
)
SGT JAMES CHANDLER,)
C/O BEREZINSKY, C/O DAISEY,)
NURSE HELEN WHITLEY, and)
DR. ROBERTA BURNS,)
)
Defendants.)

**STIPULATION AND ORDER EXTENDING THE TIME FOR PLAINTIFF TO
RESPOND TO DEFENDANTS DR. ROBERTA BURNS AND NURSE HELEN
WHITLEY'S MOTION TO VACATE DEFAULT JUDGMENT**

1. On March 20, 2008, Motion of Defendants, Roberta Burns and Nurse Helen Whitley, To Vacate the Court's January 29, 2008 Order Ordering Judgment By Default Be Entered at the End of the Case in Favor Plaintiff and Against Defendants Burns and Whitley ("Motion to Vacate Default Judgment") was filed.
2. During the Status Conference on April 1, 2008, the Court granted Plaintiff an extension to respond to the Motion to Vacate Default Judgment until April 14, 2008.
3. Because of ongoing settlement negotiations, Plaintiff and Defendants Helen Whitley and Roberta Burns have agreed to extend the time by which Plaintiff must respond to the Motion to Vacate Default Judgment.
4. Subject to the Court granting the extension, Plaintiff and Defendants Helen Whitley and Roberta Burns stipulate to extend the time by which Plaintiff must respond to the Motion to Vacate Default Judgment to May 5, 2008.

Dated: April 14, 2008

MARSHALL, DENNEHEY, WARNER,
COLEMAN & GOGGIN

MORRIS JAMES LLP

/s/ Kevin J. Connors
Kevin J. Connors (#2135)
Eric Scott Thompson (#4633)
1220 North Market Street, 5th Floor
P.O. Box 8888
Wilmington, DE 19899-8888
(302) 552-4300
kjconnors@mdwcg.com
esthompson@mdwcg.com
Attorneys for Defendants Roberta Burns
and Nurse Helen Whitley

/s/ Jason C. Jowers
Jason C. Jowers (#4721)
500 Delaware Avenue, Suite 1500
P.O. Box 2306
Wilmington, DE 19899-2306
(302) 888-6800
jjowers@morrisjames.com
Attorneys for Plaintiff Curtis M. Collins

SO ORDERED this _____ day of April, 2008.

United States District Court Judge

CERTIFICATE OF SERVICE

I, Jason C. Jowers, hereby certify that on April 14, 2008, I caused *Stipulation and Order Extending the Time for Plaintiff to Respond to Defendants Dr. Roberta Burns and Nurse Helen Whitley's Motion to Vacate Default Judgment* and this *Certificate of Service* to be filed with the Clerk of the Court using CM/ECF which will send notification of such filing to the following counsel of record:

Erika Yvonne Tross, Esquire
Delaware Department of Justice
Civil Division
820 North French Street, 6th Floor
Wilmington, DE 19801

/s/ Jason C. Jowers
Jason C. Jowers (#4721)